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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING**

In re:)	
)	
RED EAGLE OIL, INC.)	Case No. 11-20857
)	CHAPTER 11
)	
Debtor.)	

**STIPULATED MOTION TO CONTINUE FINAL HEARING ON DEBTOR'S
EXPEDITED MOTION FOR ENTRY OF ORDER AUTHORIZING USE OF CASH
COLLATERAL**

COMES NOW Red Eagle Oil, Inc., a Wyoming Corporation (“REO”) and Creditor Pinnacle Bank-Wyoming (“Pinnacle”), by and through their respective counsel, and hereby move to continue the final hearing on *Debtor’s Expedited Motion for Entry of Order Authorizing Use of Cash Collateral* and the objection filed by Pinnacle, and in support of their Stipulated Motion state as follows:

1. REO, as Debtor-in-Possession, filed for relief under Chapter 11 of the Bankruptcy Court on August 1, 2011.
2. A substantial portion of REO’s assets, including its inventory, accounts receivables, equipment and depository accounts (the “Collateral”), are subject to a certain Commercial Security Agreement and UCC Financing Statement[s] in favor of Pinnacle. The Collateral, whether now in existence or generated after the petition date, constitutes “cash collateral” in which the Bank holds an interest within the meaning of § 363(a) of the Bankruptcy Code.
3. REO filed its *Expedited Motion for Entry of Order Authorizing Use of Cash Collateral* on August 3, 2011. The Court entered its *Order on Motion for Expedited Hearing on*

August 4, 2011, wherein the Court set a preliminary hearing on August 9, 2011 and a final evidentiary hearing on August 22, 2011.

4. After the preliminary hearing, the Court entered its *Order Authorizing Use of Cash Collateral Pursuant to Sections 361 and 363* on August 9, 2011. This Order authorized the use of Cash Collateral (in accordance with Debtor's Motion) *nunc pro tunc* from the Petition Date through the date of final hearing.

5. REO believed that its creditors would have a better sense of how its enterprise is operating once its September Monthly Operating Report was filed on or before September 20, 2011. Thus, REO believed that the final hearing set on August 22, 2011 was premature. Pinnacle agreed. Consequently, REO and Pinnacle filed a Stipulated Motion to Continue Final Hearing on Debtor's Expedited Motion for Entry of Order Authorizing Use of Cash Collateral ("Stipulated Motion") on August 19, 2011.

6. This Court granted the Stipulated Motion on August 22, 2011 and rescheduled the final hearing for September 28, 2011.

7. On September 21, 2011 REO filed its Monthly Operating Report for August.

8. Pinnacle has consented to REO using its cash collateral for an additional thirty (30) days.

9. REO and Pinnacle request that the final hearing on REO's *Expedited Motion for Entry of Order Authorizing Use of Cash Collateral* be continued until the earliest of October 28, 2011, and set the final hearing for a day mutually convenient for the Court and the parties.

10. REO and Pinnacle agree that this Court's *Order Authorizing Use of Cash Collateral Pursuant to Sections 361 and 363* dated August 9, 2011, will remain effective through the date of the continued final hearing. Thus, Pinnacle is consenting to the continued use of the cash collateral (as defined in paragraph 7 of the Motion) in accordance with *Debtor's Expedited Motion for Order Authorizing Use of Cash Collateral*.

11. Counsel for REO has conferred with counsel for ExxonMobil Oil Corporation (“Exxon”) and Exxon has stated that it has no objection to this motion or to REO using Pinnacle’s cash collateral for an additional thirty (30) days.

WHEREFORE, REO and Pinnacle request that the Court continue the final hearing set for September 28, 2011 on REO’s *Expedited Motion for Entry of Order Authorizing Use of Cash Collateral* to a day mutually convenient for the Court and for the parties on or after October 28, 2011, and that this Court’s prior *Order Authorizing Use of Cash Collateral Pursuant to Sections 361 and 363* dated August 9, 2011 remain in effect until after the continued final hearing.

DATED this 27th day of September, 2011.

RED EAGLE OIL, INC.

By: /s/
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PINNACLE BANK – WYOMING

By: /s/
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CERTIFICATE OF SERVICE

I, Bradley T. Hunsicker, hereby certify that a true and correct copy of the foregoing **Stipulated Motion to Continue Final Hearing on Debtor’s Motion for Entry of Order Authorizing Use of Cash Collateral** was served upon **The Office of the United States Trustee**, by electronic mail, served upon **20 Largest Unsecured Creditors** by e-mail or facsimile, and all other parties registered as CMF/ECF users in this case via the Court’s CMF/ECF electronic mail service, this 27th day of September, 2011.

 /s/
Bradley T. Hunsicker

